

Mr. Soji Honma  
Heartland Automotive, LLC  
P.O. Box 648  
Greencastle, IN 46135

Re: MPR 133-12303  
First Minor Permit Revision to  
MSOP 133-10520-00027

Dear Mr. Honma:

Heartland Automotive, LLC was issued a minor source operating permit on May 24, 1999 for an automotive plastic parts coating source. A letter requesting a revision to this permit was received on May 22, 2000. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of an adhesive application booth, known as AB-1.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

MLK:MES

cc: File - Putnam County  
U.S. EPA, Region V  
Putnam County Health Department  
Air Compliance Section Inspector - Marc Goldman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**NEW SOURCE CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR MANAGEMENT**

**Heartland Automotive, Inc.  
300 South Warren Drive  
Greencastle, Indiana 46135**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 133-10520-00027	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: May 24, 1999
First Minor Permit Revision: MPR 133-12303-00027	Pages Affected: 4, 5, 17-19, and added 19(a)
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates an automotive plastic parts coating source.

Authorized Individual: S. Houma  
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135  
Mailing Address: P.O. Box 648, Greencastle, Indiana 46135-0648  
Phone Number: 765-653-4263  
SIC Code: 3089, 3999  
County Location: Putnam  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) natural gas-fired boiler, known as B-1, rated at 1.36 million British thermal units per hour, installed in May 1989, exhausted through Stack B.
- (b) One (1) door panel assembly line, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, installed in May 1989, and hot stake, exhausted through C-3, installed in February 1999, capacity: 112.5 door panels per hour.
- (c) One (1) chemical storage and mixing room, installed in January 1989, exhausted through general ventilation.
- (d) One (1) touch-up paint booth, exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.
- (e) Two (2) natural gas-fired make-up air units, known as MAU-1 and MAU-2, rated at 2.4 million British thermal units per hour, each, installed in October 1997.
- (f) One (1) slush mold/powder slush operation, consisting of two (2) natural gas fired, rated at 1.19 million British thermal units per hour each, known as SM/PS installed in November 1998, exhausted through Stack E, capacity: 31.25 parts/skins per hour.
- (g) One (1) apron, rear gate and lid thermoforming press, consisting of one (1) electric oven, exhausted through Stack F, installed in March 1999, capacity: 25.0 aprons per hour, 12.5 rear gates per hour and 8.1 lids per hour.
- (h) Two (2) surface coating booths, known as SB-1 and SB-2, equipped with air atomizing spray applicators and dry filters for PM overspray, exhausted through Stacks SB-1 and SB-2,

associated with two (2) flash-off areas and one (1) paint kitchen, exhausted through Stacks FO-1 and FO-2 and PK-1, capacity: 62.5 plastic automotive parts per hour.

- (i) One (1) natural gas drying oven, known as D-1, rated a 1 million British thermal unit per hour, exhausted through Stack D-1.
- (j) Nine (9) injection molding machines, consisting of three (3) 2,200 injection molding machines, installed in 1989, one (1) 850 injection molding machine, installed in March 1995, one (1) 830 injection molding machine installed in 1989, two (2) 650 injection molding machines, installed September 1997 and November 1998, one (1) 515 injection molding machine, installed in 1989 and one (1) 450 injection molding machine, installed November 1998, capacity: 1,500 automotive parts per day total.
- (k) One (1) adhesive application booth, known as AB-1, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 62.5 plastic automotive parts per hour.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas-fired boiler, known as B-1, rated at 1.36 million British thermal units per hour, installed in May 1989, exhausted through Stack B.
- (b) One (1) door panel assembly line, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, installed in May 1989, and hot stake, exhausted through C-3, installed in February 1999, capacity: 112.5 door panels per hour.
- (c) One (1) chemical storage and mixing room, installed in January 1989, exhausted through general ventilation.
- (d) One (1) touch-up paint booth, exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.
- (e) Two (2) natural gas-fired make-up air units, known as MAU-1 and MAU-2, rated at 2.4 million British thermal units per hour, each, installed in October 1997.
- (f) One (1) slush mold/powder slush operation, consisting of two (2) natural gas fired, rated at 1.19 million British thermal units per hour each, known as SM/PS installed in November 1998, exhausted through Stack E, capacity: 31.25 parts/skins per hour.
- (g) One (1) apron, rear gate and lid thermoforming press, consisting of one (1) electric oven, exhausted through Stack F, installed in March 1999, capacity: 25.0 aprons per hour, 12.5 rear gates per hour and 8.1 lids per hour.
- (h) Two (2) surface coating booths, known as SB-1 and SB-2, equipped with air atomizing spray applicators and dry filters for PM overspray, exhausted through Stacks SB-1 and SB-2, associated with two (2) flash-off areas and one (1) paint kitchen, exhausted through Stacks FO-1 and FO-2 and PK-1, capacity: 62.5 plastic automotive parts per hour.
- (i) One (1) natural gas drying oven, known as D-1, rated a 1 million British thermal unit per hour, exhausted through Stack D-1.
- (j) Nine (9) injection molding machines, consisting of three (3) 2,200 injection molding machines, installed in 1989, one (1) 850 injection molding machine, installed in March 1995, one (1) 830 injection molding machine installed in 1989, two (2) 650 injection molding machines, installed September 1997 and November 1998, one (1) 515 injection molding machine, installed in 1989 and one (1) 450 injection molding machine, installed November 1998, capacity: 1,500 automotive parts per day total.
- (k) One (1) adhesive application booth, known as AB-1, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 62.5 plastic automotive parts per hour.

## Emission Limitations and Standards

### D.1.1 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) The amount of VOC delivered to the applicators of two (2) surface coating booths (SB-1 and SB-2) shall be limited to twenty-four (24) tons per twelve (12) month consecutive period. Therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6

(New Facilities: General Reduction Requirements) do not apply.

- (b) Any change or modification which would increase the potential to emit VOC from adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM.

**D.1.2 HAPs [326 IAC 2-1-3.4]**

- (a) The amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) month consecutive period respectively. Therefore, the requirements of 326 IAC 2-1-3.4 (New source toxics control) do not apply.
- (b) Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from adhesive application booth, known as AB-1, to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAM.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

The PM from the adhesive application booth (AB-1), two (2) surface coating booths (SB-1 and SB-2) and slush mold/powder slush operation shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) surface coating booths (SB-1 and SB-2) and any control devices.

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-1.1-11]**

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if these emission units are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.7 VOC Emissions**

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### **D.1.8 HAPs Emissions**

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the HAPs usage for the most recent twelve (12) month period.

#### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.9 Particulate Matter (PM)**

The dry filters for PM overspray control shall be in operation at all times when the adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2) are in operation.

#### **D.1.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (C-4, SB-1 and SB-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.11 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1(a) and (b) and D.1.2(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the HAPs and VOC emission limits established in Conditions D.1.1(a) and D.1.2(a).
  - (1) The amount of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.



- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (c) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

40+Mail to: Permit Administration & Development Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Heartland Automotive, LLC  
P.O. Box 648  
Greencastle, Indiana 46135

### Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal knowledge of the  
(Company Name)  
representations contained in this affidavit and am authorized to make these representations on behalf of  
\_\_\_\_\_.  
(Company Name)
4. I hereby certify that Heartland Automotive, LLC, 300 S. Warren Drive, Greencastle, Indiana 46135, has constructed the adhesive application booth in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Management on May 22, 2000 and as permitted pursuant to **Construction Permit No. 133-12303, Plant ID No. 133-00027** issued on \_\_\_\_\_.
5. I hereby certify that Heartland Automotive, LLC is now subject to the Title V program and will submit a Title V or FESOP operating permit application within twelve (12) months from the postmarked submission date of July 7, 1999 of the Affidavit of Construction for MSOP 123-10520-00027 issued on May 24, 1999.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
                                  )SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Minor Permit Revision to a Minor Source

#### Source Background and Description

**Source Name:** Heartland Automotive, LLC  
**Source Location:** 300 South Warren Drive, Greencastle, Indiana 46135  
**County:** Putnam  
**SIC Code:** 3089, 3999  
**Operation Permit No.:** MSOP 133-8350-00027  
**Operation Permit Issuance Date:** May 24, 1999  
**Minor Permit Revision No.:** MPR 133-12303-00027  
**Permit Reviewer:** Mark L. Kramer

The Office of Air Management (OAM) has reviewed a revision application from Heartland Automotive, LLC relating to the construction and operation of the following emission units and pollution control devices:

One (1) adhesive application booth, known as AB-1, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 62.5 plastic automotive parts per hour.

#### History

On May 22, 2000, Heartland Automotive, LLC submitted an application to the OAM requesting to add the above surface coating booth to their existing plant. The existing electric cure oven shall be reused if possible, and the existing conveyor shall be refitted for the new adhesive application booth. This adhesive application booth will be a retro-fit of an existing water-based adhesive booth. Heartland Automotive, LLC was issued a Minor Source Operating Permit (MSOP 123-10520-00027) on May 24, 1999. That permit required that the source submitted Title V Operating Permit within 12 months of the post-marked submission date of the Affidavit of Construction which was July 7, 1999. Therefore, this application will be processed as a Minor Permit Revision to their MSOP.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
C-4	Adhesive Application Booth	33.0	2.0	7,500	70 - 100

### Recommendation

The staff recommends to the Commissioner that the MSOP Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 22, 2000.

### Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.415
PM <sub>10</sub>	0.415
SO <sub>2</sub>	0.000
VOC	24.9
CO	0.000
NO <sub>x</sub>	0.000

  

HAPs	Potential To Emit (tons/year)
Toluene	9.97
Hexane	9.97
TOTAL	19.9

### Justification for Revision

The MSOP is being revised through a MSOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(g)(4) since the modification has a potential to emit VOC greater than ten (10) tons per year and less than twenty-five (25) tons per year.

### County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Putnam County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.15
PM <sub>10</sub>	1.15
SO <sub>2</sub>	0.022
VOC	47.9
CO	3.01
NO <sub>x</sub>	3.58

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the TSD for MSOP 123-10520 issued May 24, 1999.

### Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this MSOP revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Proposed Revision	0.083	0.083	0.000	24.9	0.000	0.000	19.9
PSD Threshold Level	250	250	250	250	250	250	-

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this proposed revision.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-4.1-1 (New source toxics control)

The potential to emit a single HAP from this proposed modification to an existing permitted source is less than ten (10) tons per year and the potential to emit the combination of all HAPs is less than twenty-five (25) tons per year and the modification can not make finished product by itself. Therefore, the requirements of this rule are not applicable.

#### 326 IAC 6-3 (Process Operations)

The adhesive application booth shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:  $E = 4.10 P^{0.67}$ , where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour.

The dry filters shall be in operation at all times the adhesive application booth is in operation, in order to comply with this limit.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

This modification to an automotive plastics parts coating source does not have the potential to emit more than twenty-five (25) tons per year of VOC, and therefore, 326 IAC 8-1-6 is not applicable.

## Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

### A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (k) **One (1) adhesive application booth, known as AB-1, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 62.5 plastic automotive parts per hour.**

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (k) **One (1) adhesive application booth, known as AB-1, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 62.5 plastic automotive parts per hour.**

## Emission Limitations and Standards

### D.1.1 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) The amount of VOC delivered to the applicators of two (2) surface coating booths (SB-1 and SB-2) shall be limited to twenty-four (24) tons per twelve (12) month consecutive period. Therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.
- (b) **Any change or modification which would increase the potential to emit VOC from adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAM.**

### D.1.2 HAPs [326 IAC 2-1-3.4]

- (a) The amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) month consecutive period respectively. Therefore, the requirements of 326 IAC 2-1-3.4 (New source toxics control) do not apply.
- (b) **Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from adhesive application booth, known as AB-1, to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAM.**

### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the **adhesive application booth (AB-1)**, two (2) surface coating booths (SB-1 and SB-2) and slush mold/powder slush operation shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.9 Particulate Matter (PM)**

The dry filters for PM overspray control shall be in operation at all times when the **adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2)** are in operation.

#### **D.1.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (**C-4, SB-1 and SB-2**) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.11 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1(a) and (b) and D.1.2(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the HAPs and VOC emission limits established in Conditions D.1.1(a) and D.1.2(a).
- (1) The amount of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (c) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



## **Conclusion**

The construction of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 133-12303-00027.

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

Page 2 of 2 TSD AppA

**Company Name:** Heartland Automotive, LLC  
**Address City IN Zip:** 300 South Warren Drive, Greencastle, Indiana 46135  
**MSOP MPR:** 133-12303  
**Plt ID:** 133-00027  
**Reviewer:** Mark L. Kramer  
**Date:** May 22, 2000

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Hexane						Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)					
<b>AB-1</b>																	
<b>Hi-Bon</b>																	
Door UPR Front RH:	6.67	0.00480	62.500	30.00%	30.00%						2.63	2.63					
Door UPR Front LH:	6.67	0.00480	62.500	30.00%	30.00%						2.63	2.63					
Door UPR Rear RH:	6.67	0.00430	62.500	30.00%	30.00%						2.36	2.36					
Door UPR Rear LH:	6.67	0.00430	62.500	30.00%	30.00%						2.36	2.36					
<b>Individual Total</b>											<b>9.97</b>	<b>9.97</b>					
<b>Overall Total</b>											<b>19.9</b>						

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Page 1 of 2 TSD App A**

**Company Name:** Heartland Automotive, LLC  
**Address City IN Zip:** 300 South Warren Drive, Greencastle, Indiana 46135  
**MSOP MPR:** 133-12303  
**Pit ID:** 133-00027  
**Reviewer:** Mark L. Kramer  
**Date:** May 22, 2000

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency	Product Coated
<b>AB-1 Hi-Bon</b>																	
Door UPR Front RH:	6.67	95.00%	20.0%	75.0%	20.0%	5.00%	0.00480	62.500	6.25	5.00	1.50	36.0	6.6	0.11	100.1	75%	Plastic Door Parts
Door UPR Front LH:	6.67	95.00%	20.0%	75.0%	20.0%	5.00%	0.00480	62.500	6.25	5.00	1.50	36.0	6.57	0.110	100.1	75%	Plastic Door Parts
Door UPR Rear RH:	6.67	95.00%	20.0%	75.0%	20.0%	5.00%	0.00430	62.500	6.25	5.00	1.344	32.266	5.889	0.098	100.1	75%	Plastic Door Parts
Door UPR Rear LH:	6.67	95.00%	20.0%	75.0%	20.0%	5.00%	0.00430	62.500	6.25	5.00	1.34	32.3	5.89	0.098	100.1	75%	Plastic Door Parts

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Total</b>	<b>5.69</b>	<b>136.6</b>	<b>24.9</b>	<b>0.415</b>
	VOC	PM		
Control Eff.	<b>0.00%</b>	<b>80.00%</b>	<b>5.7</b>	<b>137</b>
			<b>24.9</b>	<b>0.083</b>

METHODOLOGY

**After Controls**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Worst case VOC weight percent used, rather than average to be conservative.